

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIJAH BURTON, DONESHA BURTON, KELSEY FLEMING, QUINCY AUSTIN, and EDGAR TORRES, on behalf of themselves, individually, and on behalf of all others similarly-situated,

Plaintiffs,

-against-

CE SOLUTIONS GROUP, LLC, FLAGGING SPOTTING FLIPPING SERVICES INC., CE FLAGGING PLUS CORP., ARGANI INC., EDWARD SLININ, individually, DORA SLININ, individually, GARY SAMUEL, individually, and HASSAN SIBLINI, individually,

Defendants.

Docket No.: 1:22-cv-03213-JPO

**NOTICE OF ACCEPTANCE
OF RULE 68 OFFER OF
JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 68 of the Federal Rules of Civil Procedure (“Rule 68”), Plaintiffs Elijah Burton, Donesha Burton, Kelsey Fleming, Quincy Austin, Edgar Torres, and Opt-in Plaintiffs Jorge Luis Rodriguez and Luis Jose Rodriguez, hereby provide Notice of their Acceptance of the Rule 68 Offer of Judgement served by Defendants FLAGGING SPOTTING FLIPPING SERVICES, INC., CE FLAGGING PLUS CORP., ARGANI INC., GARY SAMUEL, individually, and HASSAN SIBLINI, individually, and attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 68 and *Yu v. Hasaki Rest., Inc.*, 944 F.3d 395 (2d Cir. 2019), notice of this acceptance has been served and that this filing, along with proof of that service, shall be deemed acceptance of the Rule 68 offer and the clerk must enter judgment thereof.

Dated: New York, New York
December 30, 2021

Respectfully submitted,
JOSEPH & NORINSBERG, LLC

By:



MICHAEL R. MINKOFF

Attorneys for Plaintiffs

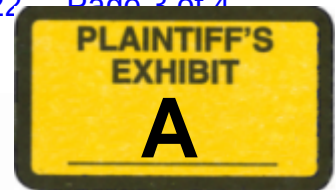
110 East 59th Street, Suite 3200

New York, New York 10022

Tel.: (212) 227-5700

Fax: (212) 656-1889

Attorneys for Plaintiffs



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIJAH BURTON, DONESHA BURTON, KELSEY FLEMING, QUINCY AUSTIN, and EDGAR TORRES, on behalf of themselves, individually, and on behalf of all others similarly-situated,

Plaintiffs,

-against-

CE SOLUTIONS GROUP, LLC, FLAGGING SPOTTING FLIPPING SERVICES INC., CE FLAGGING PLUS CORP., ARGANI INC., EDWARD SLININ, individually, DORA SLININ, individually, GARY SAMUEL, individually, and HASSAN SIBLINI, individually,

Defendants.

Docket No.: 1:22-cv-03213-JPO

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants FLAGGING SPOTTING FLIPPING SERVICES, INC., CE FLAGGING PLUS CORP., ARGANI INC., GARY SAMUEL, individually, and HASSAN SIBILINI, individually, (collectively, "Argani Defendants"), hereby offer to allow judgment to be taken against them, jointly and severally, in the sum of twenty-five thousand dollars (\$25,000.00), inclusive of all of Plaintiffs Elijah Burton, Donesha Burton, Kelsey Fleming, Quincy Austin, Edgar Torres, and opt-in Plaintiffs, Jorge Luis Rodriguez, and Luis Jose Rodriguez, for all claims for relief and damages, inclusive of attorneys' fees and costs, and in full and final resolution of all claims against the Argani Defendants arising out of, alleged in, or related to, the facts and transactions alleged in the above-captioned action.

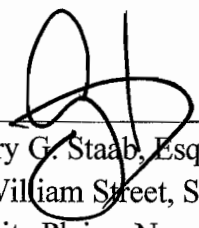
This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as an admission of liability on the part of the Argani Defendants or proof that Plaintiffs have suffered any damages of any kind.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiffs serve written notice of their acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. An offer not accepted within the specified time period for acceptance will be deemed withdrawn. Any evidence of this Offer of Judgment, whether accepted or not, shall be inadmissible except in a proceeding concerning its enforcement by either party.

Dated: Westchester, New York
December 30, 2022

**GARY G. STAAB LLC
LAW OFFICE OF RICHARD GRESIO**

By: _____


Gary G. Staab, Esq.
2 William Street, Suite 302
White Plains, New York 10601
g.staab@att.net

Richard Gresio, Esq.
7600 Jericho Tpk. Ste. 304 Woodbury, New
York 11797
gresiolaw@aol.com
*Attorneys for Defendants Flagging
Spotting Flipping Services, Inc., CE
Flagging Plus Corp., Argani Inc.,
Gary Samuel, individually, and Hassan
Sibilini, individually*